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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

| DRIFTER ENTERTAINMENT, INC., a Delaware corporation, | Civil Action No. |
|---|------------------|
| Plaintiff, | |
| V. | |
| BLOCKCHAIN GAME PARTNERS, INC. d/b/a GALA GAMES, a Wyoming corporation, | |
| Defendant. | |

MOTION FOR ADMISSION PRO HAC VICE

I, Cole L. Gustafson, of Davis & Cannon, LLP, Sheridan, Wyoming, counsel for Plaintiff, Drifter Entertainment, Inc., in the above-entitled action, and pursuant to U.S.D.C.L.R. 84.2 respectfully moves for the admission of Michael P. Hatley to practice before this Court, *pro hac vice*, with full authority to appear and participate as co-counsel in the representation of Plaintiff, Drifter Entertainment, Inc., in the above-entitled civil action. As grounds therefor, Movant Cole L. Gustafson states:

- 1. Michael P. Hatley practices with the firm of McNaul Ebel Nawrot & Helgren PLLC, located at 600 University Street, Suite 2700, Seattle, Washington 98101. Mr. Hatley's telephone number is (206) 389-9366, and his email address is mhatley@mcnaul.com.
- 2. He is a member in good standing of the Bars of the State of Washington and the State of New York. He has been a member of the Washington State Bar since 2021 and the New York State Bar since 2014. He has also been admitted to practice before the United States District Court for the Western District of Washington (admitted 2021), the United States District Court for the Southern District of New York (admitted 2019), and the United States District Court for the District of Columbia (admitted 2018). He has never been disciplined by any Bar, nor has he been the subject of any public sanctions.
- 3. I confirm that, to my knowledge, Mr. Hatley is an attorney of good moral character and veracity, and that he will comply with and be bound by the Local Rules of this Court.
- 4. I further state that I am a member in good standing of the Bar of the State of Wyoming and the Bar of the United States District Court for the District of Wyoming. I will continue to participate actively in the conduct of this case as counsel for Drifter Entertainment, Inc, and I or an attorney from my firm shall be fully prepared to represent the client at any time and in any capacity.

WHEREFORE, Movant Cole L. Gustafson moves this Court for the *pro hac vice* admission of Michael P. Harley and for such other and further relief that this Court might deem just.

RESPECTFULLY SUBMITTED this 10th day of October, 2023.

DAVIS AND CANNON, LLP

By: /s/ Cole L. Gustafson

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